

GEORGIA M. PESTANA  
Corporation Counsel

THE CITY OF NEW YORK  
LAW DEPARTMENT  
100 CHURCH STREET  
NEW YORK, NY 10007

**MEMO ENDORSED:**

The application is granted. The conference scheduled for March 1, 2022 is adjourned to **April 14, 2022, at 11:30 a.m.**

SO ORDERED.



Paul G. Gardephe  
United States District Judge  
Dated: February 23, 2022

February 23, 2022

**VIA ECF**

Hon. Paul G. Gardephe  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: *N.G. v. N.Y.C. Dep't of Education*, 21-cv-8488 (PGG)(JLC)

Dear Judge Gardephe:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Georgia M. Pestana, attorney for Defendant in the above-referenced action, wherein Plaintiffs seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.

I write to respectfully request that the March 1, 2022 conference be adjourned *sine die* and that the deadline for Defendant's answer be extended to April 7, 2022. Plaintiff consents to these request. This is the first request to adjourn the conference *sine die* and the third request for an answer extension. The first request was made on October 28, 2021 and granted by Your Honor on November 3, 2021. The second request was made on January 3, 2022 and granted by Your Honor that same day. The requested extension will provide Defendant with time to receive additional settlement authority from the Office of the N.Y.C. Comptroller and make a further settlement offer to Plaintiff. We are hopeful that the parties will settle this matter without further burden on the Court's time.

Accordingly, Defendant respectfully requests that the March 1, 2022 conference be adjourned *sine die* and that the answer deadline be extended to April 7, 2022.

Thank you for considering these requests.

Respectfully submitted,

/s/

Martha Nimmer  
Special Assistant Corporation Counsel

cc: Justin Coretti, Esq. (via ECF)